

#### DIVISION OF ENVIRONMENTAL PROTECTION

GASTON CAPERTON GOVERNOR

1304 Goose Run Road Fairmont, WV 26554-1392 LAIDLEY ELI McCOY, Ph.D. DIRECTOR

December 5, 1995

Triangle Wire and Cable Company 1701 Wheeling Avenue Glen Dale, WV 26038

Attention: Tom Forbes

Dear Mr. Forbes:

Enclosed is a copy of the Compliance Evaluation Inspection (CEI) and Pre-Closure Report completed on your facility by a representative of the Chief from the Office of Waste Management. This report is based on the inspection conducted on October 18, 1995.

There were no areas of non-compliance with the appropriate Hazardous Waste Managment Regulations documented during the inspection.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at (304) 367-2724.

Stanley J. Moskal

Environmental Inspector Supervisor Compliance Monitoring and Enforcement

Office of Waste Management

SJM:st

Enclosure:

Jeanne Sofield, U.S. EPA, Region III CC: Stan Moskal, Inspector RCRA File CME File

### **INSPECTION FACT SHEET**

COMPANY NAME: Triangle Wire & Cable Company <u>I.D.#</u>: WVD004314928 1701 Wheeling Avenue TYPE OF FACILITY: Small Quantity MAILING ADDRESS: Glen Dale, WV Generator Glen Dale, WV COUNTY: Marshall LOCATION: Tom Forbes HANDLING CODES: S01 **COMPANY CONTACT:** PHONE: RCRA Compliance Evaluation Inspection, Pre-Closure PURPOSE: West Virginia Hazardous Waste Management Act, Chapter 22-18: **APPLICABLE REGULATIONS:** West Virginia Administrative Regulations for Chapter 22-18; and/or 40 CFR Parts 260 thru 279 LIST OF CHEMICALS: (For Small Quantity Generators, list amount of waste, how it is handled, where it goes) \_ DETERMINATION PENDING NOT APPLICABLE \_\_\_ VIOLATIONS X NO VIOLATIONS DATE INSPECTED: October 18, 1995 Stan Moskal, West Virginia Division of Environmental Protection, INSPECTOR: (1)

Office of Waste Management, Fairmont District Office

(2) Jim Gaston, West Virginia Division of Environmental Protection,

Office of Waste Management, Wheeling Field Office

(3) Charlie Moses, Jim Laine, West Virginia Division of Environmental Protection, Environmental Enforcement

DATE PREPARED: November 21, 1995

PREPARED BY: Stan Moskal, Office of Waste Management

#### INSPECTION REPORT

RE: Triangle Wire and Cable Company (WVD004314928)

DATE INSPECTED: October 18, 1995

INSPECTOR: Stan Moskal, West Virginia Division of Environmental Protection,

Office of Waste Management, Fairmont District Office

Jim Gaston, West Virginia Division of Environmental Protection,

Office of Waste Management, Wheeling Field Office

Charlie Moses, West Virginia Division of Environmental Protection,

Environmental Enforcement

Jim Laine, West Virginia Division of Environmental Protection,

Environmental Enforcement

DATE PREPARED: November 21, 1995

PREPARED BY: Stan Moskal, Office of Waste Management

On October 18, 1995, the above referenced inspectors conducted a RCRA Compliance Evaluation Inspection and Pre-Closure Inspection at the Triangle Wire and Cable Company located at Glen Dale, West Virginia. Upon our arrival we were met by Mr. Chuck McClarin, Manufacturing Technical Manager and Mr. Tom Forbes, Operations Manager. The facility had been notified of our intentions to inspect this facility.

Upon presentation of appropriate credentials the company officials were informed of our authority as representatives of the Director of the Division of Environmental Protection pursuant to Chapter 22 of the Code of West Virginia and as specified by Section 3007(a) of the Resource Conservation and Recovery Act. They acknowledged our authority. The company officials were informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 22, Article 18), and the regulations promulgated thereunder.

The primary reason for the closure of this facility is due to its purchase by Allied Tube, which has decided to close this facility. The last scheduled work day is set for November 6, 1995.

This facility manufactures galvanized conduits. It receives coiled steel and through a series of processes that includes: cutting, stretching and welding, the conduit is formed. This product is then pickled, zinc coated and painted.

During our inspection, the main areas of concern were the strip lines. The first strip line is located in an inactive area of the plant. A chromate acid solution was used in this line and the tank still contains it. Additionally, a second empty tank was noticed on this line. This tank is concrete and

CEI & Pre-Closure( Triangle Wire and Cable Company, 1701 Wheeling Avenue, Glen Dale, WV) EPA ID# WVD004314928
October 18, 1995
Page two

lined with brick. Facility representatives informed us that this tank was used to clean the metal prior to the chromate solution tank. Around this tank, on the dirt floor and permeating through the concrete tank was a green colored material. I explained to the facility representatives that this situation has been observed before at other facilities that use chromium containing materials. Generally, the problem is TCLP levels of chromium in the material, since acid mixed chrome will permeate concrete readily. Facility representatives were informed that the chromate solution will need to be disposed of and the tank cleaned under RCRA regulations. Also, the concrete tank and surrounding area will need sampled and analyzed for TCLP chromium. Pending receipt of analytical work, disposal of the concrete tank and any remediated material will be determined.

A second strip line was noted in the area designated Bay 6. Similar concerns were noted here and the same remediation should be undertaken. Currently, this line is active.

Upon leaving the old strip line, we proceeded to the Machine shop area. This area is divided into several bays and each was inspected individually. Bay 6 is in this area and has been addressed.

Bay 1 is a storage area. Wastes and materials of concern located in this area included a 110-gallon Safety-Kleen unit. Also noted were two (2) 35-gallon drums of Chloro-Solv, an electric motor cleaner containing 1,1,1 Trichloroethane.

Safety-Kleen needs to be contacted concerning this unit and have it removed. The Chloro-Solv is a good, viable product. In lieu of disposal, the facility should attempt to locate another business that can use this material. If this is possible, then Triangle Wire and Cable should keep all correspondence, receipts, etc., documenting any transactions.

At Bay 2, several drums of used and viable oil were noted. Any used oil will require proper waste determination and disposal under 40 CFR Part 279 (Used Oil Regulations). Any viable oil can be handled in the same manner as the Chloro-Solv.

Bay 3 is utilized for used equipment storage. Two (2) drums of used hydraulic oil were noted and will need managed under 40 CFR Part 279.

Bay 4 contains the facility's waste water treatment system. No materials that would fall under RCRA regulations were noted.

Bay 5 is used for product storage. Six (6) drums of gray paint were noted. It is unknown if this paint is waste. This facility needs to determine if this material is a waste or product and properly manage it.

CEI & Pre-Closure( Triangle Wire and Cable Company, 1701 Wheeling Avenue, Glen Dale, WV) EPA ID# WVD004314928
October 18, 1995
Page three

Bay 7 is used for raw steel shipping and receiving. Primary slitting is also conducted in this area. Two (2) drums of oil were noted. Proper disposal of material within regulations needs to be done

The final area visited was the Tube Bay. Located at this area are the weld line, EMT plating line and storage. Located within this area are several tanks. Some of these tanks are empty, while others are still in use or have sludges in them. These materials include acids and pickling liquors. The facility will be required to dispose of all materials in the appropriate manner and clean all tanks.

Finally, outside the building is an area where UST's are located. Facility representatives were unsure of the status of this area. This will be referred to the UST program in Wheeling.

# **CONCLUSION**

This facility needs to conduct a proper assessment at each of the strip lines, mainly chromium analysis. Additionally, all tanks and contents need to be disposed of and managed in accordance with applicable laws. All materials in drums should have waste determinations conducted on them for disposal.

Facility should attempt to find businesses that can use any viable material. If this option is chosen, this facility should maintain all records of such transactions.

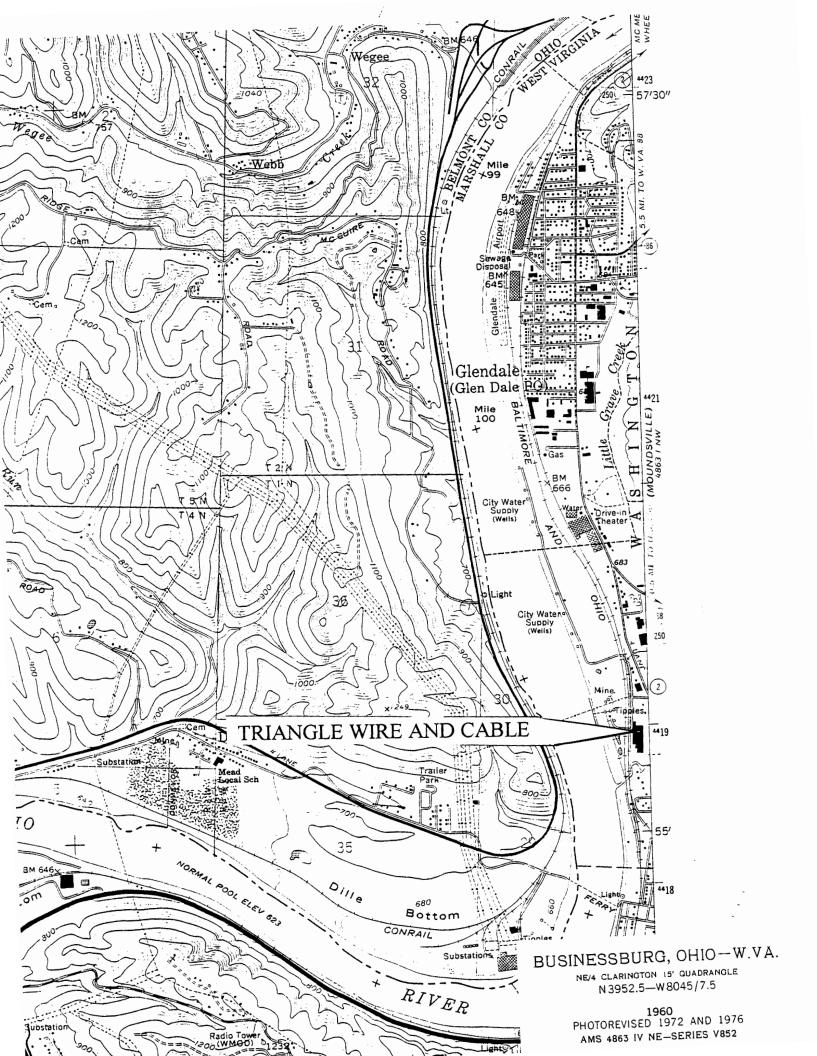
It is the facility's responsibility to conduct such waste determination and remediation at this plant to ensure that all RCRA related wastes and conditions are managed, in accordance with State and Federal Regulations.

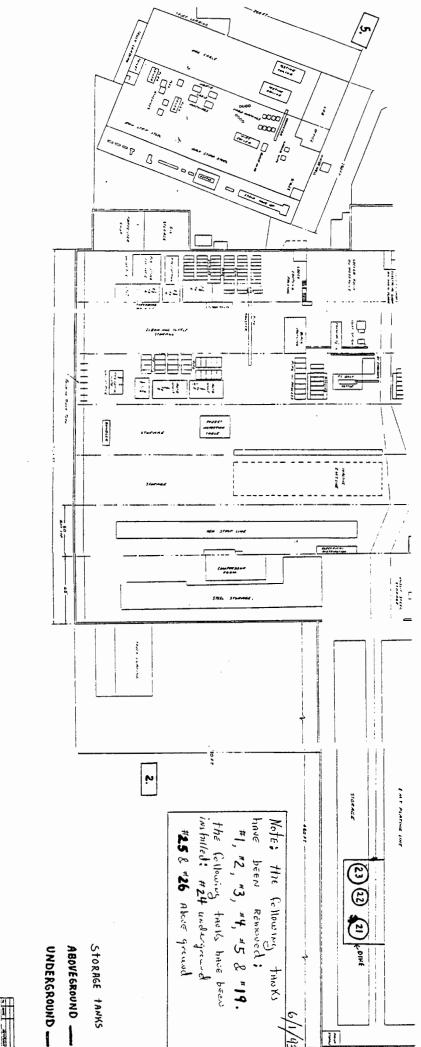
#### WASTE MINIMIZATION

Facility is closing and is attempting to minimize the waste generated during this process.

# COMPLIANCE EVALUATION

No violations noted.





# GLEN DALE STORAGÉ TANKS

This write up goes with a blueprint showing the plant layout and the location of 26 storage tanks. Tanks 1 thru 5 were removed in 1989 along with tank #19. Only one tank is now located underground, number 24.

Tank No. <u>Description</u>	Capacity	Material Construction	Date Installed	Condition
#1 Thinner VII&P Naphtha	10,000 gal.	Stee1	7/15/75	Removed 1989
#2 Gasoline	3,000 gal.	Steel	7/15/78	Removed 1989
#3 Fuel Oil	10,000 gal.	Steel	12/31/50	Removed 1989
#4 Fuel Oil	10,000 gal.	Steel	12/31/50	Removed 1989
#5 Cutting Oil	10,000 gal.	Steel	12/31/50	Removed 1989
#6 Flocculate Supply Tank	400 gal.	FRP	1976	Very Good
#7 Sludge Holding Tank	7,000 gal.	FRP	1976	Very Good
#8 Lime Slurry Tank	5,870 gal.	FRP	1976	Very Good
#9 Caustic Makeup Tank	5,870 gal.	FRP	1976	Very Good
#10 Filltrate Holding Tank	22,000 gal.	FRP	1976	Good
#11 Focculation Tank	4,040 gal.	FRP	1976	Good
#12 PH Adjustment	3,100 gal.	FRP	1976	Very Good
#13 Waste Water Mix Tank	2,280 gal.	FRP	1976	VERY Good

Page -2-GLEN DALE STORAGE TANKS

Tank No.  Description	Capacity	Material Construction	Date Installed	Condition
#14 Clarifier	16,000 gal.	FRP	1976	Very Good
#15 Sludge Holding Tank	4,040 gal.	FRP	1976	Very Good
#16 Sludge Holding Tank	4,000 gal.	FRP	1976	Very Good
#17 Sludge Holding Tank	9,100 gal.	FRP	1976	Very Good
#18 Sulfuric Acid Tank	10,000 gal.	FRP	11/30/64	Good
#19 Sulfuric Acid Tank	10,000 gal.	FRP	11/30/64	Removed 1989
#20 Plater Solution	30,000 gal.	FRP	1975	Very Good
#21 Pickle Acid Tank	6,000 gal.	FRP	1975	Very Good
#22 Plater Make Up	2,000 gal.	FRP	1975	Very Good
#23 Plater Clarifier	3,760 gal.	FRP	1975	Very Good
#24 Thinner VM&P Naptha	10,000 gal.	Coated Steel	1990	Excellent
#25 Fuel Oil	10,000 gal.	Steel	1990	Excellent
#26 Gasoline	3,000 gal.	Steel	1990	Excellent

EVALUATION - VIOLATION - ENFORCEMENT FORM					
Handler ID Number	04/95 VERSION				
w: v: D: 0: 0: 4:3: 1: 4: 9: 2: 8 Tom Forbes	RESERVED FOR EPA USE				
Handler Name					
TRIANGLE wire and GABLE Co					
Street City					
1701 wheeling AVE GENDALE					
UNIVERSE CHANGE REQUIRED YES [/] NO [ ]					
1. Indicate the facility's current universe(s):  SQ   III. Indicate the new transporter status (Mark herequires a transporter status change):	re only if the facility				
II. Indicate the new RCRIS Generator Universe Transporter [ ] Non-	Transporter [ ]				
(mark only one):  If the transporter box is checked, you must check at least one of the boxes.  Check the	is box if the facility is				
LOG [ ] CEG [ ] NON-HANDLER [ ] below:	listed in RCRIS as a er and no longer				
Mark Mode of Transportation transport	s hazardous waste.				
NOTE: All TSD activity changes must be handled by [ ] Air [ ] Water the state data coordinates and cannot be					
the state data coordinator and cannot be the made using this form					
EVALUATION Add X Change Delete					
Date Number Agency Type Reason Branch					
101895 S CEI C.M.					
AREAS OF EVALUATION ( E - Evaluated NE - Not Evaluated NA - Not App	olicable )				
GGR E GSC E TWD DGW DOR DWP BRR	FEA :				
GLB & GSQ & DCH DLB DPB DIN BPS	css				
GMR GEX DCL DLF DP DIA BIS	≟				
GOR TGR DCP DLT DSI DPS BCE	<del>-</del>				
GPT TMR DFR DFR DMC DTR DOP BDT	<del> </del>				
Comments Facility is Clossol.	<u></u>				
OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION  Agency Number Area Date Determined Agency Number Area	Date Determined				
Agency Number Area Date Determined Agency Number Area	Date Determined				
╶┝═╣╞ <del>═╞═┋╒</del> ┩╠ <del>╒┋╒┋</del> ┩╠ <del>┋┋╏</del> ╬┼╬╌┩╎╞═╣╞╤╤╤═┩╠═╤╤═┥					
╶╞═╣╠ <del>╒┋╒┋╒</del> ┩╠ <del>╒┋╒</del> ┩╏ <del>╒┋╏┋</del> ╇┼					
VIOLATION Add Change Delete Link to Above E	valuation? (Y/N)				
Agency Number Area Class Regulation Type Regulation Citation					
Returned to Compliance  Date Determined Priority Branch Person Scheduled Actual					
Comments					
Comments Required if pertinent ☐ Required only for previously reported data ☐ Not Required by EPA					



# STATE OF WEST VIRGINIA DEPARTMENT OF COMMERCE, LABOR AND ENVIRONMENTAL RESOURCES WASTE MANAGEMENT SECTION

1356 Hansford Street
Charleston, West Virginia 25301
Telephone (304)348-5929
October 28, 1991

GASTON CAPERTON Governor J. EDWARD HAMRICK III
Director

ANN A. SPANER Deputy Director

Charles McClarin, Technical Superintendent Triangle PWC, Inc. 1701 Wheeling Avenue Glen Dale, West Virginia 26038

Dear Mr. McClarin:

Enclosed is a copy of the **Compliance Evaluation Inspection (CEI)**Report completed on your facility by a representative of the Chief of the Waste Management Section. This report is based on the inspection conducted on September 10, 1991.

There were no areas of non-compliance with the appropriate Hazardous Waste Management Regulations documented during this inspection.

Thank you for your assistance and cooperation during this inspection. If you have any questions concerning the inspection or attached report, please feel free to contact this office at (304) 348-5989.

Sincerely,

H. Michael Dorsey, Assistant Chief Compliance Monitoring/Enforcement

HMD/kw

Enclosure

cc: Janemarie Newton Frieheiler, U.S. EPA, Region III Pamela S. Beltz, Inspector File

#### INSPECTION FACT SHEET

COMPANY NAME:

Triangle PWC, Inc.

I.D. #:

WVD004314928

MAILING ADDRESS:

1701 Wheeling Avenue Glen Dale, WV 26038

Technical Superintendent

TYPE OF FACILITY:

Small Quantity

Generator

LOCATION: Route 2

Marshall COUNTY:

COMPANY CONTACT:

Charles McClarin

HANDLING CODES:

S01

PHONE:

(304) 845-4020

PURPOSE:

Compliance Evaluation Inspection

APPLICABLE REGULATIONS:

West Virginia Hazardous Waste Management Act, Chapter 20-5E;

West Virginia Administrative Regulations for Chapter 20-5E;

and/or 40 CFR Parts 260 thru 268.

#### LIST OF CHEMICALS:

(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

D001 - 4.3 tons in 1990-Safety Kleen, Wheeling

VIOLATIONS

DATE INSPECTED:

September 10, 1991

X NO VIOLATIONS

INSPECTOR(S):

- Pamela S. Beltz, West Virginia Division of Natural Resources, (1)Waste Management Section, Wheeling Field Office
  - James A. Gaston, West Virginia Division of Natural Resources, (2) Waste Management Section, Wheeling Field Office

(3)

DATE PREPARED: September 13, 1991

PREPARED BY:

Pamela S. Beltz, Waste Management Section

RECEIVE

OCT 2 5 1991

DEPT. OF NATURAL RESOURCES DIVISION OF WASTE MANAGEMENT

#### INSPECTION REPORT

RE: Triangle PWC, Inc. (WVD004314928)

DATE INSPECTED: September 10, 1991

INSPECTED BY: Pamela S. Beltz, West Virginia Division of Natural Resources,

Waste Management Section

James A. Gaston, West Virginia Division of Natural Resources,

Waste Management Section

DATE PREPARED: September 13, 1991

PREPARED BY: Pamela S. Beltz, Waste Management Section

On September 10, 1991 the above mentioned inspector conducted a Compliance Evaluation Inspection at Triangle PWC, Inc.. Upon our arrival we were met by Mr. Charles McClarin, Superintendent who had not previously been advised of our intentions to inspect this facility.

Upon presentation of appropriate credentials, we advised the official of our authority as representatives of the Chief of the Waste Management Section pursuant to Chapter 20 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act and he acknowledged our authority. The facility representative was informed that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 20, Article 5E) and the regulations promulgated thereunder.

Triangle PWC, Inc., is a manufacturer of galvanized pipe and narrow-width metal strips. The hazardous waste generated is waste petroleum naphtha in the five (5) parts cleaner units which is serviced by Safety-Kleen, Wheeling. This facility is a small quantity generator.

Mr. McClarin produced for the above mentioned inspectors the contractual agreement for the hazardous waste which is reclaimed by Safety-Kleen. The five (5) parts cleaners are serviced every three (3) weeks. The two (2) extra 30-gallon drums are checked every six (6) weeks. The shipment receipts for hazardous waste transport were viewed for the 1991 shipments. The facility has a current listing of emergency response contacts and phone numbers and a map with the fire extinguishers' locations. This information is posted at the guard service office. Mr. McClarin had the latest analysis on the wastewater treatment sludge (See Attachment "C").

This inspector inquired about the build up of sludge in the galvanizing process tanks, according to Mr. McClarin, there is no accumulation of sludge in the chromic acid tanks. All rinsewater and possible sludge goes to the wastewater treatment process. The waste stream is treated and the sludge goes to the City of Wheeling Landfill, Ohio County. The effluent is discharged via NPDES.

CEI (Triangle PWC. Inc) September 13, 1991 Page two

The galvanizing tank is cleaned out periodically. The sludge is purchased by Zinc Corporation of America in Monaca, Pennsylvania, to reclaim the zinc. This facility hopes to finalize an agreement with Zinc Corporation of America to reclaim the wastewater treatment sludge for zinc by the end of next month.

We took a tour of the facility. All five (5) parts cleaner units were in use. It was discussed that the drums of waste solvent have to be labelled and an accumulation date marked upon the drums upon being taken out of use. Mr. McClarin stated that he thought Safety-Kleen took care of these requirements when they serviced the parts cleaners.

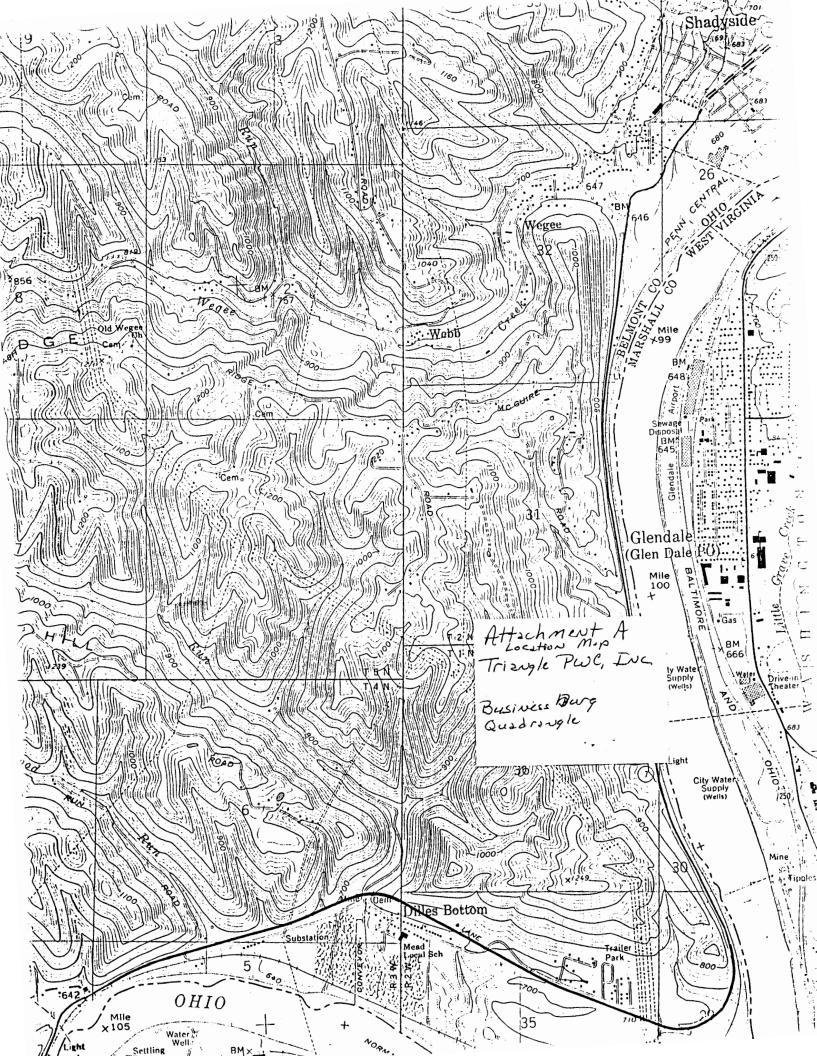
We conducted a brief exit interview, thanked Mr. McClarin for his cooperation and departed.

# AREAS OF CONCERN

Mr. McClarin mentioned that they have several gallons of old paint on-site. If this is determined to be a waste, Triangle PWC will dispose of it as a hazardous waste through Safety-Kleen, Wheeling. This material needs to be determined in a timely fashion whether it is a usable product or a hazardous waste.

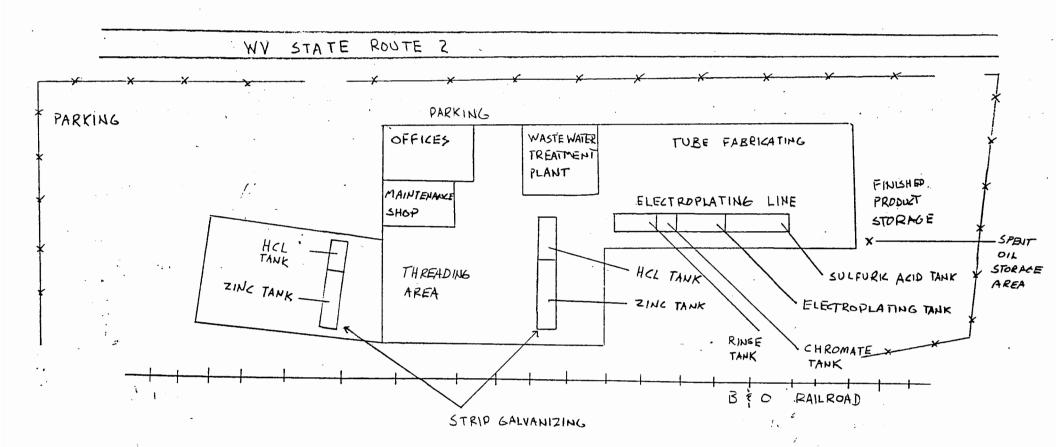
# VIOLATIONS

No violations were noted during this inspection.



# ATTACHMENT -B SITE MAP TRIANGLE PWC INC

- N



6751-L Engle Road Cleveland, OH 44130 216-891-4700

5350 Campbells Run Road Pittsburgh, PA 15205 800-228-6870

HALLIBURTON NUS Environmental Laboratories

August 09, 1991
Report No.: 00001902.
Section A Page 2

# LABORATORY ANALYSIS REPORT

CLIENT NAME: TRIANGLE PWC, INC. NUS CLIENT NO: 1035 0001 WORK ORDER NO: 55830 1701 WHEELING AVENUE ADDRESS: VENDOR NO: 05845300 GLENDALE, WV 26038-ATTENTION: C. McCLARIN CC: DATE SAMPLED: SAMPLE ID: LIME NEUTRALIZED SLUDGE / TCLP LEACH 28-JUN-91 NUS SAMPLE NO: P0167076 DATE RECEIVED: 01-JUL-91 P.O. NO.: APPROVED BY: J Simanic

<u>LN</u>	TEST CODE	DETERMINATION	RESULT	UNITS
 			i	
1	5903	TCLP Leaching Procedure	DONE	
2	AASL	Arsenic, Leachable (As)	< 0.003	mg/L
3	ABAL	Barium, Leachable (Ba)	0.20	mg/L
4	ACDL	Cadmium, Leachable (Cd)	< 0.005	mg/L
5	ACRL	Chromium, Leachable (Cr)	0.75	mg/L
6	APBL	Lead, Leachable (Pb)	< 0.05	mg/L
7	AHGL	Mercury, Leachable (Hg)	< 0,0002	mq/L
8	ASEL	Selenium, Leachable (Se)	< 0.004	mg/L
9	AAGL	Silver, Leachable (Ag)	0.01	ma/L

COMMENTS: